

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

CASE NO.: 23—10425DD

SYLVAN PLOWRIGHT

Plaintiff,

v.

MIAMI-DADE COUNTY,
A Political subdivision of the
State of Florida and ALFREDO RAMIREZ III,
CHIEF MDPD, officers
L. RONDON and A. CORDOVA
Defendants.

/

MOTION TO FILE CIVIL APPEAL STATEMENT

COMES NOW the appellant, by and through the undersigned
counsel, and files this Motion To File Civil Appeal Statement out of
time and would state as grounds therefore the following:

1. The undersigned counsel received approval of his
admission application February 24, 2023.
2. The fees for admission were paid today by the undersigned.
3. The Civil Appeal Statement and Certificate of Interested
Parties are attached to be filed today.

WHERFORE the undersigned counsel request permission to file the above
mentioned documents out of turn.

CERTIFICATE OF SERVICE

I hereby certify that on this FEBRUARY 28 2023 I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record for service via transmission of Notices of Electronic filing generated by CM/ECF.

/s/ William C. Robinson

WILLIAM C. ROBINSON, ESQ
Florida Bar No: 386847
Attorney for Plaintiff
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U.S. COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

**CERTIFICATE OF INTERESTED PERSONS
AND CORPORATE DISCLOSURE STATEMENT (CIP)**

PLOWRIGHT vs. **MIAMI DADE** Appeal No. **23-10425**

11th Cir. R. 26.1-1(a) requires the appellant or petitioner to file a Certificate of Interested Persons and Corporate Disclosure Statement (CIP) with this court within 14 days after the date the case or appeal is docketed in this court, and to include a CIP within every motion, petition, brief, answer, response, and reply filed. Also, all appellees, intervenors, respondents, and all other parties to the case or appeal must file a CIP within 28 days after the date the case or appeal is docketed in this court. **You may use this form to fulfill these requirements.** In alphabetical order, with one name per line, please list all trial judges, attorneys, persons, associations of persons, firms, partnerships, or corporations that have an interest in the outcome of this case or appeal, including subsidiaries, conglomerates, affiliates, parent corporations, any publicly held corporation that owns 10% or more of the party's stock, and other identifiable legal entities related to a party.

(please type or print legibly):

SYLVAN PLOWRIGHT

WILLIAM C ROBINSON

ERICA ZARON

MIAMI DADE COUNTY

JUDGE K M MOORE

Rev. 4/18

**UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT
CIVIL APPEAL STATEMENT**

Please TYPE. Attach additional pages if necessary.

11th Circuit Docket Number: 23-10425 DD

| | |
|---|--|
| Caption: PLOWRIGHT V. MIAMI DADE | District and Division: <u>SOUTHERN DIST. FLORIDA</u> Name of Judge: <u>K. M MOORE</u> Nature of Suit: <input type="checkbox"/> CIVIL RIGHTS Date Complaint Filed: 1/17/22 District Court Docket Number: 22-CV-20203 Date Notice of Appeal Filed: 2 / 8 / 23 <input type="checkbox"/> Cross Appeal <input type="checkbox"/> Class Action Has this matter previously been before this court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, provide (a) Caption: _____ (b) Citation: _____ (c) Docket Number: _____ |
|---|--|



For Appellant:

XXXPlaintiff WILLIAM C ROBINSON P.O BOX 610575 N MIAMI FLA 33261
3054549632 Robinsonwilliam8@gmail.com

Defendant
 Other (Specify)

Attorney Name

Mailing Address

Telephone, Fax, Email

For Appellee: ERICA S. ZARON 111 NW 1ST ST MIAMI FLA 33130
3053755151 ERICA.ZARON@MIAMIDADE.GOV

Plaintiff
 Defendant
 Other (Specify)

Please CIRCLE/CHECK/COMPLETE the items below and on page 2 that apply.

| Jurisdiction | Nature of Judgment | Type of Order | Relief |
|---|---|--|---|
| <input type="checkbox"/> XXFederal Question <input type="checkbox"/> Diversity <input type="checkbox"/> US Plaintiff <input type="checkbox"/> US Defendant | <input type="checkbox"/> Final Judgment, 28 USC 1291 <input type="checkbox"/> Interlocutory Order, 28 USC 1292(a)(1) <input type="checkbox"/> Interlocutory Order Certified, 28 USC 1292(b) <input checked="" type="checkbox"/> Interlocutory Order, Qualified Immunity <input type="checkbox"/> Final Agency Action (Review) <input type="checkbox"/> 54(b) | <input checked="" type="checkbox"/> Dismissal/Jurisdiction <input type="checkbox"/> Default Judgment <input type="checkbox"/> Summary Judgment <input type="checkbox"/> Judgment/Bench Trial <input type="checkbox"/> Judgment/Jury Verdict <input type="checkbox"/> Judgment/Directed Verdict/NOV <input type="checkbox"/> Injunction <input type="checkbox"/> Other _____ | Amount Sought by Plaintiff: \$200K Amount Sought by Defendant: \$ Awarded: <input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/> Injunctions: <input type="checkbox"/> TRO <input type="checkbox"/> Preliminary <input type="checkbox"/> Granted <input type="checkbox"/> Permanent <input type="checkbox"/> Denied |

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11th Circuit Docket Number: _____

Based on your present knowledge:

(1) Does this appeal involve a question of First Impression Yes No
What is the issue you claim is one of First Impression? _____

(2) Will the determination of this appeal turn on the interpretation or application of a particular case or statute Yes No
If Yes, provide
(a) Case Name/Statute _____
(b) Citation _____
(c) Docket Number if unreported _____

(3) Is there any case now pending or about to be brought before this court or any other court or administrative agency that
(a) Arises from substantially the same case or controversy as this appeal Yes No
(b) Involves an issue that is substantially the same, similar, or related to an issue in this appeal Yes No
If Yes, provide
(a) Case Name _____
(b) Citation _____
(c) Docket Number if unreported _____
(d) Court or Agency _____

(4) Will this appeal involve a conflict of law
(a) Within the Eleventh Circuit? Yes No
(b) Among circuits? Yes No

If Yes, explain briefly:

(5) Issues proposed to be raised on appeal, including jurisdictional challenges:

Quasi-federal and sovereign immunity
Implementation of training by government

I CERTIFY THAT I SERVED THIS CIVIL APPEAL STATEMENT ON THE CLERK OF THE U.S. COURT OF APPEALS FOR THE ELEVENTH CIRCUIT AND SERVED A COPY ON EACH PARTY OR THEIR COUNSEL OF RECORD, THIS 28 DAY OF Feb 2023,

William C. Robinsow
NAME OF COUNSEL (Print)

W
SIGNATURE OF COUNSEL